

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

KIMBERLY KJESSLER, KLAIRE
RUECKERT, LAURA BRALEY, TIMOTHY
HAYDEN and SUMMER LANG, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

ZAAPPAAZ, INC., AZIM MAKANOJIYA,
NETBRANDS MEDIA CORP.,
MASHNOON AHMED, GENNEX MEDIA,
LLC, BRANDECO, L.L.C., AKIL KURJI,
CUSTOM WRISTBANDS INC., and
CHRISTOPHER ANGELES,

Defendants.

Civil Action No. 4:18-cv-0430
(Consolidated)

**DECLARATION OF DANIEL C. HEDLUND IN SUPPORT OF
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Daniel C. Hedlund, declare as follows:

1. I am a member of Gustafson Gluek, PLLC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action").
2. My firm served as Plaintiffs' Counsel in the Action.
3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through and including today's date. The total number of hours spent by my firm during this period was 641.10, with a corresponding total lodestar (at historical rates) of \$347,468.75. This schedule was prepared from contemporaneous daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs

in the Action, my firm did the following--oftentimes working cooperatively with co-counsel: investigating the underlying factual record and developing the legal theories of the case; drafting the initial complaints and the subsequent consolidated amended class action complaint; drafting the opposition to Defendants' motions to dismiss; drafting and serving discovery on Defendants; responding to discovery served by Defendants; reviewing, analyzing, summarizing, and organizing documents produced by Defendants; coordinating case strategy and discovery with Plaintiffs' co-counsel; and coordinating settlement strategy with Plaintiffs' co-counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$1,235.90 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including today's date. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected in the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 2, 2020

/s/ Daniel C. Hedlund
Daniel C. Hedlund
Member
Gustafson Gluck, PLLC

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**EXHIBIT 1 TO THE DECLARATION OF DANIEL C. HEDLUND IN SUPPORT OF
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception Through Today's Date

Name	Position	Hours	Historical Rate	Lodestar
Daniel C. Hedlund	P	7.5	\$925.00	\$6,937.50
Daniel C. Hedlund	P	25.75	\$900.00	\$23,175.00
Daniel C. Hedlund	P	53.50	\$875.00	\$46,812.50
Daniel C. Hedlund	P	20.25	\$850.00	\$17,212.50
Jason S. Kilene	P	0.50	\$875.00	\$437.50
Jason S. Kilene	P	10.00	\$850.00	\$8,500.00
Cathy K. Smith	P	1.00	\$650.00	\$650.00
Cathy K. Smith	P	0.25	\$625.00	\$156.25
Michelle J. Looby	P	10.25	\$675.00	\$6,918.75
Michelle J. Looby	P	77.00	\$650.00	\$50,050.00
Michelle J. Looby	P	72.50	\$625.00	\$45,312.50
Michelle J. Looby	P	29.50	\$600.00	\$17,700.00
David A. Goodwin	P	1.00	\$600.00	\$600.00
Joseph C. Bourne	A	0.25	\$450.00	\$112.50
Kaitlyn L. Dennis	A	4.25	\$425.00	\$1,806.25

Kaitlyn L. Dennis	A	93.00	\$400.00	\$37,200.00
Kaitlyn L. Dennis	A	204.35	\$375.00	\$76,631.25
Ling S. Wang	A	1.25	\$250.00	\$312.50
Riley A. Conlin	A	15.00	\$300.00	\$4,500.00
Jamie L. Holzer	PL	2.25	\$200.00	\$450.00
Chelsea M. Noble	PL	11.75	\$150.00	\$1,762.50
TOTAL		641.10		\$347,468.75

Role Legend

P Partner
 S Shareholder
 SC Senior Counsel
 OF Of Counsel
 A Associate
 LC Law Clerk
 PL Paralegal
 I Investigator
 SA Staff Attorney
 CA Contract Attorney

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**EXHIBIT 2 TO THE DECLARATION OF DANIEL C. HEDLUND IN SUPPORT OF
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Summary Expense Report
Inception Through Today's Date

Expense	Total Amount
Electronic Research (Lexis/Westlaw/PACER)	\$159.52
Court Costs – Filing Fees	
Litigation Fund Contribution	
Federal Express/Overnight Delivery/Messengers	
Photocopies – In House	\$49.70
Photocopies – Outside	
Postage	
Service of Process Fees	
Telephone/Fax	\$30.24
Transportation/Meals/Lodging	\$996.44
Co-Counsel Fees	
Experts/Consultant Fees	
Court Reporter Service/Hearing Transcript Fees	
TOTAL EXPENSES	\$1,235.90